



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

August 15, 2011

Mr. Mark Durno, Chief
Emergency Response Section 1
U.S. EPA Region V
25089 Center Ridge Road
Westlake, Ohio 44145

US EPA RECORDS CENTER REGION 5



493799

**RE: SK Hand Tools Corporation, Defiance County (OHD045247350)
Hazardous Waste**

Dear Mr. Durno:

Ohio EPA requests U.S. EPA assistance in conducting an assessment and potential time critical removal action at the former SK Hand Tools Corporation (SK) facility located at 135 Hickory Street, Defiance, Ohio. The facility commenced operations in the 1980's, and was active until operations terminated in 2010. Currently, the site is comprised of its original manufacturing building (~160,000 square feet), a garage building, and an empty parking lot. The site is located in a densely populated residential area with the closest residential property approximately twenty (20) feet from the property and the Maumee River approximately 0.4 miles north of the facility.

SK manufactured hand tools such as wrenches and ratchets, generating electroplating sludge (F006, D007), acids (D002), stripping waste (D002, D007), and occasionally chromic acid solution (D002, D007) and was a large quantity generator of hazardous waste. More than 100 containers of plating related hazardous materials and containers of hazardous waste remain at the site ranging in size from one quart to one thousand (1000) gallon tanks. Labels on containers indicate the presence of sulfuric acid, plating solutions containing nickel and chromium, and lubricating oils. Ohio EPA is concerned about the release and potential impact of these hazardous chemicals on the surrounding community and environment. SK failed to comply with Ohio Cessation of Regulated Operations regulations which require a facility that is closing to properly remove and dispose of all the hazardous materials or wastes left behind after manufacturing activities ceased. The current owner has declared bankruptcy, and his representative has indicated that no further action is planned for the site. Because of this, Ohio EPA is requesting US EPA's assistance to assess, identify, and subsequently dispose of the hazardous chemicals still present at the facility to mitigate any immediate threat to human health and the environment. The attached referral package has additional information and photographs of the containers left behind at the facility.

Site History:

In 2002, SK notified Ohio EPA of its hazardous waste activity at the facility. SK was inspected in 2005 and a formal enforcement action took place in 2006 as a result of the violations discovered during the 2005 inspections. SK was inspected again by Ohio EPA in 2008 and 2010. On September 14, 2010, SK notified Ohio EPA that it had ceased operations at the facility on July 30, 2010. SK requested an extension to the 90-day Cessation of Regulated Operations (CRO) requirement for submittal of documentation that all chemicals on site had been removed. Ohio EPA granted the extension request until January 15, 2011. On January 11, 2011, SK requested an additional extension. This second extension was granted until April 15, 2011. To date, documentation showing that SK has complied with CRO requirements has not been submitted to Ohio EPA.

Conclusion:

A potential for release of hazardous wastes or other materials to the environment is possible. Due to the close proximity of residential homes, the potential for vandalism exists, which would expose persons and the environment to chemical releases. Additionally, if chemicals are spilled and contact groundwater, there is a potential for off-site migration of contaminated groundwater. Because of this risk to human health and the environment, I hereby request that U.S. EPA conduct a site investigation to assess the applicability of a time critical removal at 135 Hickory Street, Defiance, Ohio. Ohio EPA would also request that it be notified of any activities conducted at this site. If you have any related questions, or require any additional information, please contact Ed Pulido at Ohio EPA's Northwest District Office at (419)373-3015, or Kelly Jeter of my staff at 614-728-5337.

Sincerely,

Kelly Jeter, for

Bruce McCoy, Manager
Compliance Assurance Section
Division of Materials and Waste Management

Attachment

TH/tms

pc: Colleen Weaver, DMWM, NWDO
DMWM-HW, NWDO File: SK Hand Tools Corporation, Defiance County

ec: Ed Pulido, DMWM, NWDO
Kelly Jeter, DMWM, CO
Jeff Mayhugh, DMWM, CO
Mitch Mathews, DMWM, CO
Kevin Clouse, OSI